

State Water Resources Control Board

September 25, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 7928 4031

Mr. Ricarlito Ignao
Senior Station Engineer
City and County of San Francisco
425 Seventh Street
San Francisco, California 94103
ricarlito.ignao@sfgov.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT SHERIFFS DEPARTMENT, 425 SEVENTH STREET,
SAN FRANCISCO**

Dear Mr. Ignao:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on September 13, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Tag Monitoring Equipment – The monitoring certification tag was not affixed to the annular sensor.	All	September 13, 2018	Ongoing	23 CCR 2638(f)
2	Failure to Install Monitoring Equipment According to Manufacturer's Instructions – The wire splice for the annular sensor is required to be placed inside a weather proof electrical junction box according to Veeder Root's installation manual.	All	September 13, 2018	Ongoing	23 CCR 2638(a)
3	Failure to Perform Secondary Containment Test – On November 30, 2017, only the annular interstitial space was tested for both tanks. All other secondary components were not tested.	All	December 1, 2017	Ongoing	23 CCR 2367(a)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

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No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Continuously Monitor Emergency Generator Double-Walled Pressurized Piping – Daily inspection logs of the monitoring system were not available at the time of inspection.	All	September 13, 2018	Ongoing	23 CCR 2636(f)(6)
5	Failure to Maintain Monitoring Plan – In CERS, pipeline integrity test indicates “No”; however, a line integrity test is the pipe monitoring method currently being used.	All	September 13, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)
6	Failure to Maintain Maintenance, Monitoring and Testing Records Onsite – The 2016, 2017, and 2018 Line Tightness Test; 2016 and 2017 Annual Monitoring Certification and Spill Containment test; and 2017 Secondary Containment Test were not available at the time of inspection.	All	September 13, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b)
7	Failure to Maintain Financial Responsibility – The Certificate of Financial Responsibility (CFR) is incomplete and outdated. The CFR states Self-Insurance; however, the Chief Financial Officer letter states a Bond Rating is being used. If the Bond Rating is the current mechanism being used, it is outdated and required to be updated every 12 months.	All	September 13, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance. On October 1, 2018, new State regulations will require an automatic line leak detector on all underground pressurized piping connected to an emergency generator system. In lieu of restricting or shutting off the flow of product, the line leak detector may activate an audible and visual alarm. The USTs at your facility currently have line leak detectors for the underground pressurized piping; however, they are not certified. Please work with San Francisco City & County Public Health Department to ensure your facility is in compliance with the new regulatory requirements.

Please send all compliance documentation to the following:

State Water Board

Mr. Joseph Lovesee
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
joseph.lovesee@waterboards.ca.gov

Local CUPA

Mr. Jin Tang
Senior Environmental Health Inspector
San Francisco City & County Public
Health Department
1390 Market Street, Suite 210
San Francisco, California 94102
jin.tang@sfdph.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Paula Stewart
Program Manager
San Francisco City & County
Public Health Department
paula.stewart@sfdph.org

Mr. Jin Tang
Senior Environmental Health Inspector
San Francisco City & County
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jin.tang@sfdph.org